



KEVIN R. REICH  
Director

Gibbons P.C.  
One Gateway Center  
Newark, New Jersey 07102-5310  
Direct: (973) 596-4755 Fax: (973) 639-6206  
kreich@gibbonslaw.com

March 18, 2025

**VIA ECF**

Honorable Harvey Bartle III, U.S.D.J.  
United States District Court for the  
Eastern District of Pennsylvania  
16614 U.S. Courthouse  
601 Market Street  
Philadelphia, Pennsylvania 19106

**Re: *Atlas Data Privacy Corp., et al. v. Equimine, Inc. (No. 24-cv-4261)*  
Joinder in Consolidated Motions to Dismiss the Complaint**

---

Dear Judge Bartle:

We write on behalf of defendant Equimine, Inc. ("Equimine") to advise that Equimine is joining the following two motions being filed today in these Daniel's Law cases:

- Consolidated Motion to Dismiss Plaintiffs' Complaint pursuant to Rule 12(b)(6) for failure to state a claim, which is being filed on the docket for *Atlas Data Privacy Corp., et al. v. DM Group Inc.*, No. 24-cv-4075; and
- Consolidated Motion to Dismiss Plaintiffs' Complaint pursuant to Rule 12(b)(2) for lack of personal jurisdiction, being filed on the docket for *Atlas Data Privacy Corp., et al. v. GoHunt LLC*, No. 24-cv-4380.

In connection with the Rule 12(b)(2) motion, Equimine is filing a supplemental brief and the accompanying Declaration of Brian Tepfer.

For the reasons set forth in the foregoing, Equimine respectfully requests that the Court grant the motions and dismiss, with prejudice, the Complaint in the subject action.

Respectfully submitted,

*s/ Kevin R. Reich*

Kevin R. Reich

cc: Counsel of Record